

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW MEXICO**

**IN RE:  
FRANK E. EATON  
ADELA V. EATON,  
Debtors.**

**No. 13-15-12439 TL**

**CHAPTER 13 TRUSTEE'S OBJECTION TO EXEMPTIONS**

The Standing Chapter 13 Trustee, Kelley L. Skehen, objects to the debtors' claims of exemptions. In support of this objection, the Chapter 13 Trustee states as follows:

1. The trustee objects to debtors' claims of exemption in their primary residence under NMSA 42-10-1,2. This is not an allowable exemption.
2. The trustee objects to debtors' claims of exemption in the annuities pending further information and documentation about the purchase of the exemptions. In particular, upon information and belief, debtors converted non-exempt assets into an exempt annuity shortly prior to the filing of this case and the trustee objects to the debtors' claims of exemption in this annuity.

WHEREFORE, the chapter 13 trustee prays that the Court deny the debtors' exemption as set forth above and grant such further relief as the Court may deem to be just and equitable.

KELLEY L. SKEHEN  
STANDING CHAPTER 13 TRUSTEE  
Electronically filed/Kelley L. Skehen/je  
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I CERTIFY that the foregoing was electronically filed with the Court via the CM/ECF system. All attorneys and parties identified with the Court for electronic service on the record in this case were served by electronic service in accordance with the CM/ECF system on the date of filing. I certify that the foregoing was mailed by first class mail to the debtor(s) and the following parties, at the addresses listed below on November 20, 2015.

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